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ABSTRACT

The General Accounting Office (GAO) conducted a study of employment practices at the Tennessee Valley Authority (TVA) to determine if practices for employing and advancing disabled veterans comply with applicable legislation. The study found that TVA's plans describing its Disabled Vererans' Affirmative Action Program were meeting regulatory requirements in fiscal year 1986. TVA has had mixed results in achieving the objectives identified in the plans. Because of declines in TVA's work force (a 42 percent reduction from 1980 to 1986), TVA's ability to hire and advance disabled veterans may have been affected. TVA has implemented activities aimed at achieving the following plan objectives: (1) providing awareness training to supervisory personnel; (2) establishing an advisory committee of handicapped employees partly composed of disabled veterans; (3) providing guidance to managers and supervisors on how they could modify jobs to accommodate disabled veterans' abilities; and (4) adopting Uniform Federal Accessibility Standards to ensure barrier-free design in TVA facilities. The Disabled Veterans' Affirmative Action Program plan objectives that TVA has not been successful in implementing included the following: (1) increasing the number of disabled veterans on its employment register; (2) increasing disabled veterans' advancement opportunities within TVA through career planning and an upward mobility program; and (3) providing placement opportunities both within and outside TVA for disabled veterans scheduled for reductions-in-force. The TVA has recently hired a disabled veteran to head a new veretans' affairs unit to deal with all veterans' issues. (KC)

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United States General Accounting Office

GAO

Report to the Chairman, Subcommittee on Education, Training, and Employment, Committee on Veterans' Affairs, House of Representatives

December 1986

ED279858

# VETERANS' EMPLOYMENT

# TVA Can Improve Its Disabled Veterans' Affirmative Action Program

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**United States**
**General Accounting Office**
**Washington, D.C. 20548**

**Human Resources Division**

B-223685

December 31, 1986

The Honorable Tom Daschle
Chairman, Subcommittee on Education,
Training, and Employment
Committee on Veterans' Affairs
House of Representatives

Dear Mr. Chairman:

This report contains information on the status of the Tennessee Valley Authority's Disabled Veterans' Affirmative Action Program. We undertook this review in response to your request.

As requested by your office, unless you publicly announce the report's contents earlier, we will not make additional distribution for 30 days. At that time, we will send copies to the Board of Directors and the General Manager, Tennessee Valley Authority; the Director, Office of Management and Budget; the Administrator, Office of Personnel Management; and other interested parties.

Sincerely yours,

Richard L. Fogel

Richard L. Fogel
Assistant Comptroller General

# Executive Summary

## Purpose

Do the Tennessee Valley Authority's (TVA's) policies and practices for employing and advancing disabled veterans comply with applicable legislation?

Are disabled veterans entitled to preferences in promotion under the Veterans' Preference Act of 1944 and 38 U.S.C. 2014?

The Chairman, Subcommittee on Education, Training, and Employment, House Committee on Veterans' Affairs, asked GAO to determine the answers to these questions because some disabled veterans had complained that they were not receiving benefits to which they believed they were entitled.

## Background

Federal executive branch offices, departments, and agencies (hereinafter "agencies") are required by 38 U.S.C. 2014 and applicable regulations to prepare affirmative action plans and accomplishment reports specifically related to hiring and advancing disabled veterans.

The Office of Personnel Management (OPM) monitors and evaluates agencies' plans and accomplishment reports. OPM also provides technical assistance to supplement and support agencies' programs. OPM does not, however, require agencies to establish numerical goals or standards for hiring or advancing disabled veterans. By December 1 of each year, agencies must certify in writing to OPM that they have up-to-date agency-wide Disabled Veterans' Affirmative Action Program plans, and provide reports on accomplishments related to previous year's plans.

## Results in Brief

Although generally unsatisfactory in fiscal year 1983, TVA's plans, describing its Disabled Veterans' Affirmative Action Program, have improved and were essentially meeting regulatory requirements in fiscal year 1986.

TVA has had mixed results in achieving objectives identified in its Disabled Veterans' Affirmative Action Program plans; some objectives were achieved, others were not. Because of declines in TVA's work force, from 52,100 in September 1980 to 30,350 in June 1986 (a 42-percent reduction), TVA's ability to hire and advance disabled veterans may have been affected.

GAO agrees with OPM and TVA interpretations of legislation concerning disabled veterans. Although veterans are not entitled to preference for

promotion (advancement), they are entitled to preference for hiring and job retention during reductions-in-force.

## Principal Findings

### Regulatory Requirements

In fiscal years 1985 and 1986, TVA's plans met legal and regulatory requirements, except that TVA, like most other agencies, did not submit accomplishment reports and written certifications of its plans to OPM when they were due.

### Implementing the Plan

TVA has had mixed results in meeting the objectives of its Disabled Veterans' Affirmative Action Program plan. TVA has implemented activities aimed at achieving the following plan objectives:

- Providing awareness training to supervisors and managers through seminars and publications.
- Establishing an advisory committee of handicapped employees composed, in part, of disabled veterans.
- Providing guidance to managers and supervisors on how they could modify jobs to accommodate the disabled veterans' abilities and limitations.
- Adopting Uniform Federal Accessibility Standards to ensure barrier-free design in TVA facilities.

The Disabled Veterans' Affirmative Action Program plan objectives that TVA has not been successful in implementing included the following:

- Increasing the number of disabled veterans on its employment registers. (TVA has reduced its recruiting activities in recent years. Furthermore, only about 1 percent of the participants in its training programs for students and the disabled were disabled veterans.)
- Increasing disabled veterans' advancement opportunities within TVA through career planning and an upward mobility program. (TVA has not prepared, as planned, individual development plans for veterans rated to be 30-percent-or-more disabled, nor has it established an upward mobility program for disabled veterans.)
- Providing placement opportunities, both within and outside TVA, for disabled veterans scheduled for reductions-in-force. (TVA did not develop specific placement procedures within TVA for disabled veterans subject

to reductions-in-force. TVA provided opportunities for placement outside TVA to employees subject to such reductions; however, such opportunities were not specifically targeted to disabled veterans. In addition, TVA discontinued plans for a demonstration project aimed at placing such veterans with local firms because the project duplicated an existing one.)

## Agency Action

In October 1986, TVA hired a disabled veteran to head a new Veterans' Affairs Unit, which will deal specifically with all veterans' issues, including those related to disabled veterans. The new unit will (1) have some responsibility for recruiting veterans, (2) coordinate all veterans' programs at TVA, and (3) participate in developing and monitoring TVA's Disabled Veterans' Affirmative Action Program. Responsibility for the preparation of, and reporting on, the program plan will remain with TVA's Equal Opportunity Staff, which has responsibility for all of TVA's affirmative action programs. The Veterans' Affairs Unit will be responsible for seeing that the plan is implemented.

## Recommendations

This report does not contain recommendations.

## Agency Comments

GAO did not obtain formal comments on this report. However, GAO did informally discuss the report's contents with TVA and OPM officials, and their comments were incorporated where appropriate.

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### Abbreviations

| | |
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| DVAAP | Disabled Veterans' Affirmative Action Program |
| GAO | General Accounting Office |
| OPM | Office of Personnel Management |
| TVA | Tennessee Valley Authority |
| VFW | Veterans of Foreign Wars |

# Introduction

The Chairman, Subcommittee on Education, Training, and Employment, House Committee on Veterans' Affairs, asked us to determine whether the Tennessee Valley Authority's (TVA's) employment policies and practices concerning disabled veterans[1] complied with section 403 of the Vietnam Era Veterans' Readjustment Act of 1974, as amended (38 U.S.C. 2014). Based on subsequent discussions with the Subcommittee's office, we also agreed to gather statistical information on TVA's employment trends.

## Disabled Veterans' Affirmative Action Program

As established by the Congress in 1974, in 38 U.S.C. 2014(a), the policy of the United States is "to promote the maximum of employment and job advancement opportunities within the Federal Government for qualified disabled veterans and veterans of the Vietnam era." Subsection C of section 2014 requires that federal offices, departments, and agencies (hereinafter "agencies") in the executive branch prepare affirmative action program plans specifically related to the hiring and advancement of disabled veterans. The Office of Personnel Management (OPM) is responsible for monitoring and evaluating agencies' implementation of this section, as well as providing technical assistance to TVA and other agencies.

Federal regulations (5 C.F.R. 720.301-306) set out specific requirements for agencies' plans for Disabled Veterans' Affirmative Action Programs (DVAAPs), including their content and reporting requirements (see app. II). Regulations require that each agency annually certify in writing to OPM, by December 1, that it has an up-to-date agency-wide plan, covering its components. Agencies are not required to submit plans to OPM unless requested. Plans must include the agency's policy concerning the employment and advancement of disabled veterans, especially those who are 30-percent-or-more disabled; assess the current status of disabled veteran employment within the agency; and describe how the agency will recruit and provide internal advancement opportunities to disabled veterans. The agency must also describe how it will inform its components of their responsibilities for employing and advancing disabled veterans, and how the agency will monitor, review, and evaluate its planned efforts. In addition, each agency is required to annually submit to OPM, not later than December 1, an accomplishment report on the results of its plan for the previous fiscal year. Regulations also

[1]As used in the Disabled Veterans' Affirmative Action Program (DVAAP), the term "disabled veteran" means a veteran who is entitled to compensation under laws administered by the Veterans Administration or a person who was discharged or released from active duty because of a service-connected disability.

require agencies to analyze data on their employment of disabled veterans; they are to use the analysis to develop methods to improve recruiting strategies, hiring, and advancement of disabled veterans.

In addition to 38 U.S.C. 2014, the subject of veterans' preference plays a significant role in the DVAAP. An OPM official told us that although 38 U.S.C. 2014 does not mention the Veterans' Preference Act of 1944 (Public Law 78-359, as amended), the act must be considered in relation to the DVAAP. This act and applicable regulations provide disabled veterans distinct benefits concerning federal employment opportunities and retention rights. Disabled veterans who are otherwise qualified for a position generally receive a 10-point preference, which may put them higher on the appropriate employment register and may result in their employment before nondisabled veterans or nonveterans. When agencies experience reductions-in-force, disabled veterans may be the last to be released.

## TVA Organization and DVAAP Process

The Congress created the TVA in 1933 as a wholly owned government corporation. The organization is charged with such responsibilities as developing the Tennessee River and providing an adequate supply of electrical power, at the lowest feasible cost, to the Tennessee Valley region. TVA's power program is the largest in the nation; it serves nearly 7 million residents, as well as a number of commercial and industrial customers and several federal agencies throughout parts of seven southeastern states.

As of fiscal year 1985, TVA employed about 32,000 people, as compared with about 52,000 at the beginning of fiscal year 1981. TVA's work force is composed of two basic classifications of employees: (1) salary-policy and (2) trades and labor. The salary-policy classification generally includes management, scientific, and administrative personnel; the trades and labor classification includes those who construct, operate, and maintain TVA's facilities (see fig. 1.1). As of June 1986, TVA employed about 30,350 people, about 21,750 fewer people than were employed in September 1980. The total number of disabled veterans employed by TVA is shown in figure 1.2.

**Figure 1.1: Trades and Labor and Salary-Policy TVA Employees** (Fiscal Years 1981-85)

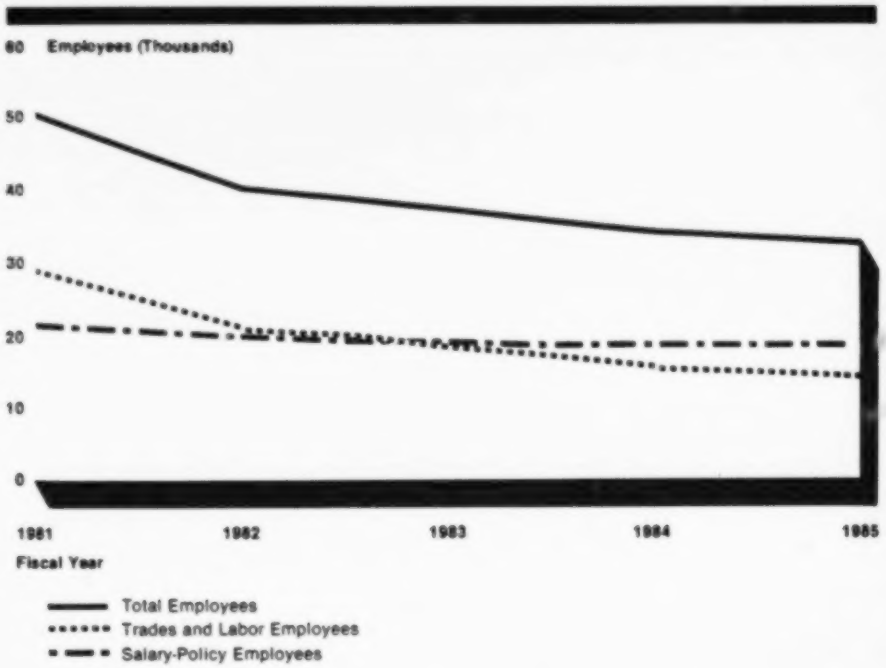
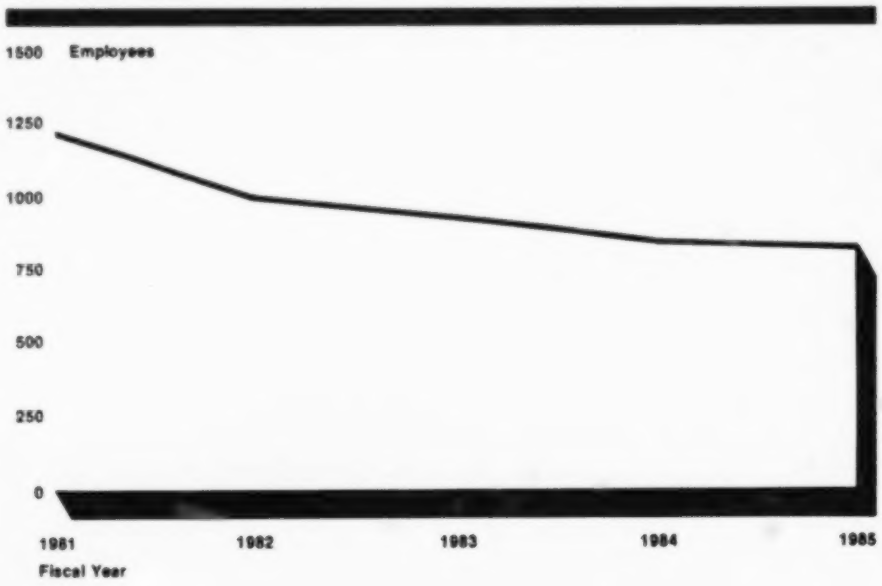
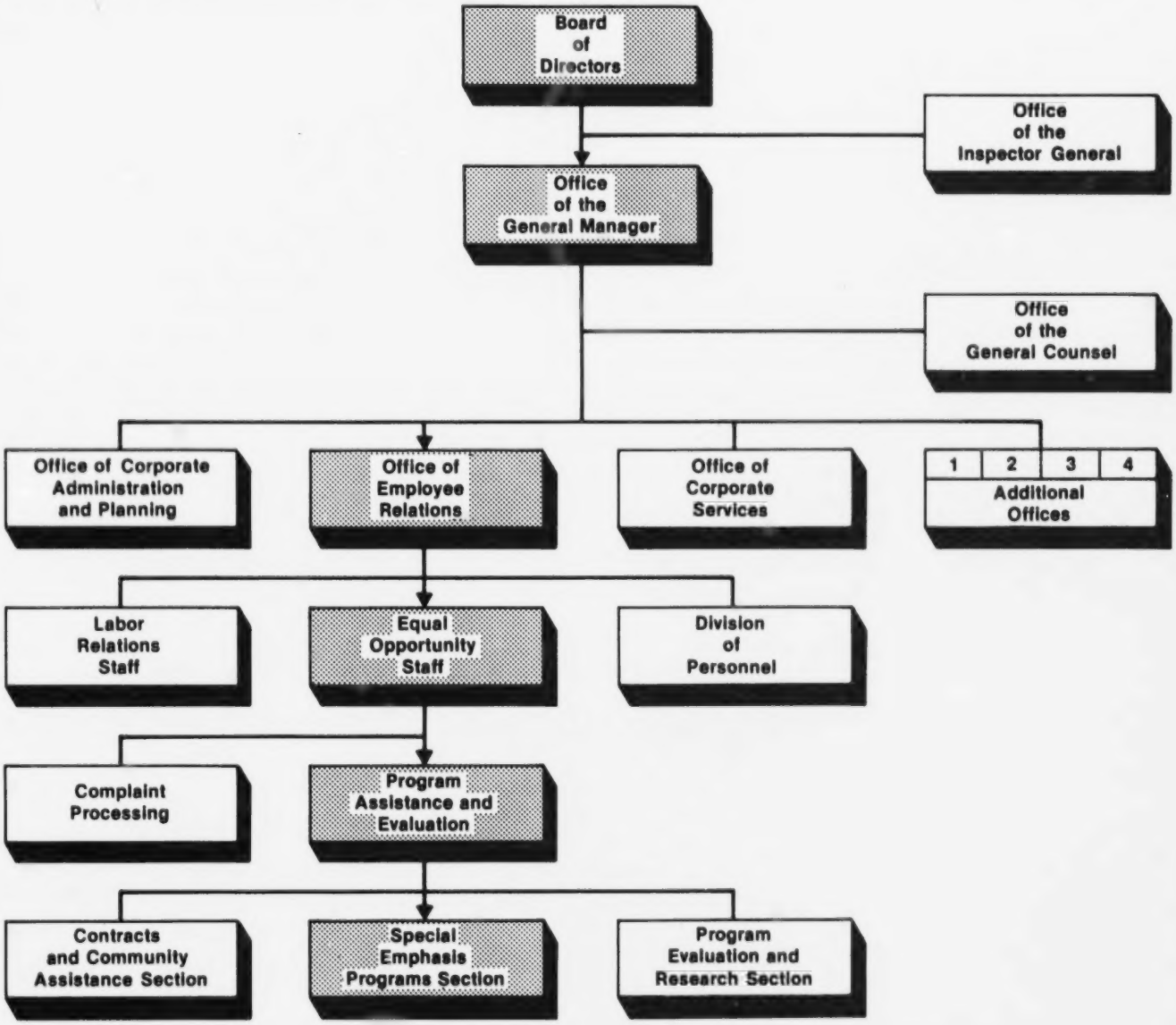



**Figure 1.2: Disabled Veteran TVA Employees** (Fiscal Years 1981-85)



TVA is headed by a three-member Board of Directors appointed by the President and confirmed by the Senate. The day-to-day affairs of the agency are administered by a General Manager who reports to the Board of Directors. TVA's DVAAP is managed by the Special Emphasis Programs Section, which is part of the Equal Opportunity Staff in the Office of Employee Relations. This section, with five staff members, is also responsible for managing affirmative action programs for the handicapped and for minorities and women. In this section, the program manager for Handicap Services is responsible for managing both the disabled veterans and handicapped programs. He allocated about 30 percent of his time to the DVAAP and 70 percent to the handicapped program. TVA's basic organizational structure, including the location of the Special Emphasis Programs Section, is shown in figure 1.3.

**Figure 1.3: TVA Organization Chart** (October 1986)



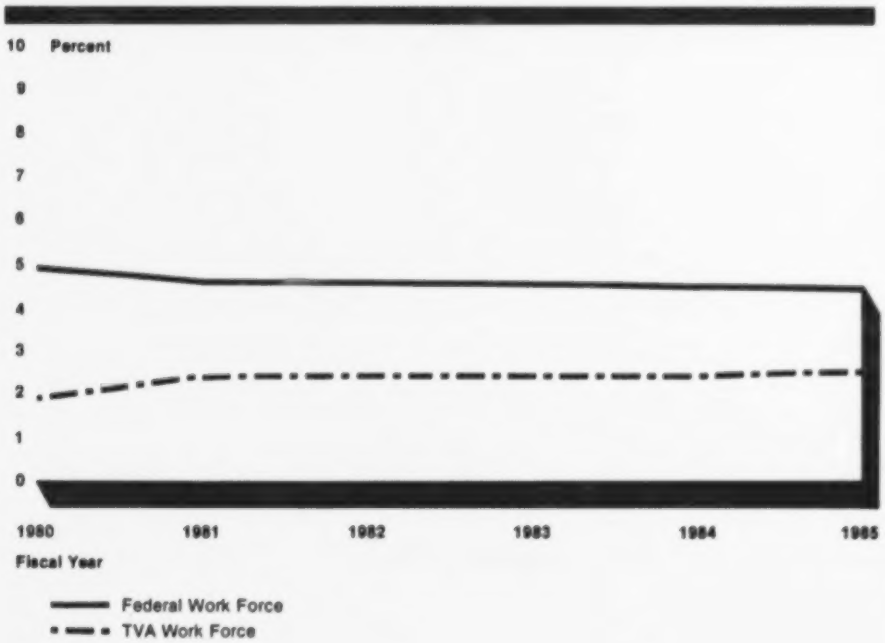
For fiscal years 1984 through 1986, TVA's Equal Opportunity Staff prepared new DVAAP plans each year. Also during that period, the staff prepared accomplishment reports on the results of DVAAP activities for fiscal years 1983 through 1985. DVAAP plans and reports must be reviewed at various levels within TVA and eventually approved by the General Manager and Board of Directors before being sent to OPM.

## OPM Involvement

On October 1, 1982, OPM became fully responsible for monitoring and evaluating executive agencies' plans for the DVAAPs. Previously, the Civil Service Commission (under section 403 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 2014)), had had this responsibility. Later, Executive Order 12106 (1978) transferred various equal employment opportunity enforcement functions from the Civil Service Commission to the Equal Employment Opportunity Commission. In October 1980, the Congress amended 38 U.S.C. 2014 and assigned OPM responsibility for planning, implementing, and overseeing DVAAPs in the federal service. OPM and the Equal Employment Opportunity Commission shared responsibility for DVAAP during fiscal year 1982.

According to an official from OPM's Office of Affirmative Employment Programs, OPM does not require or use any numerical goals or standards in assessing agencies' performance. However, to obtain an indication of an agency's performance under the DVAAP, OPM compares the percentage of disabled veterans employed by an individual agency with the percentage of disabled veterans employed by the federal government. This later percentage comes from the central personnel data file that OPM maintains for executive agencies. The file, established in 1972, is an automated system of individual records containing personnel data for most federal civilian employees. The DVAAP statistical reporting requirements are based on data available in the central file. Although TVA does not participate in the central personnel data file, OPM and TVA have adapted TVA's personnel data base to the formats required by OPM. The percentage of disabled veterans employed by the federal government and by TVA are shown in figure 1.4.

**Figure 1.4: Disabled Veterans as a Percentage of Federal and TVA Work Forces** (Fiscal Years 1980-85)




OPM has reviewed TVA's DVAAP plans for fiscal years 1983 through 1986 and its accomplishment reports for fiscal years 1983 through 1985. In March 1984, OPM also conducted an on-site review at TVA, interviewing 23 disabled veterans employed by TVA.

## Objectives, Scope, and Methodology

The objectives of this review were the following: to determine whether TVA's employment and advancement policies and practices for disabled veterans complied with requirements of 38 U.S.C. 2014 and to identify any changes necessary to assure compliance. To accomplish these objectives we (1) assessed TVA's compliance with federal regulations for the DVAAP, including TVA's timeliness in submitting written plan certifications and accomplishment reports to OPM; (2) reviewed the provisions of the Veterans' Preference Act and 38 U.S.C. 2014 to determine if disabled veterans were entitled to specific preferences for promotions; (3) evaluated TVA's implementation of its DVAAP plan; and (4) gathered data on TVA's employment trends for fiscal years 1981-85 to determine how disabled veterans were affected by hirings, promotions, and terminations.

We made our review from November 1985 through August 1986. We focused on parts of 38 U.S.C. 2014, which require federal agencies in the executive branch to have DVAAPs. Section 2014(b) of 38 U.S.C. allows agencies to appoint Vietnam era veterans to certain positions and subsequent career-conditional appointments with no time limits on eligibility. In addition, disabled Vietnam era veterans are similarly entitled to these positions without regard to the number of years of education completed. According to the chief of OPM's Evaluations Division (Affirmative Employment Programs, which oversees the DVAAP), section 2014(b) is optional, that is, an agency is not required to make such appointments but is permitted to make them if the agency chooses to do so. TVA officials told us that TVA does not make appointments under section 2014(b) because it already has sufficient hiring authority under TVA's own legislation.

Our review was primarily at TVA's headquarters in Knoxville, Tennessee. We interviewed TVA officials in the Office of Employee Relations, the Division of Personnel, and the Equal Opportunity Staff. To obtain views of TVA's DVAAP from the perspective of employees who were disabled veterans, we interviewed 9 of the 23 disabled veterans who were interviewed by OPM during its March 1984 on-site review. To determine whether TVA complied with required formats, contents, and timeliness, we compared TVA's DVAAP plans (for fiscal years 1985 and 1986 and accomplishment reports for fiscal years 1984 and 1985) with pertinent regulations. In addition, based on data provided by OPM, we compared TVA's timeliness with that of 100 federal agencies to determine whether these agencies had met the December 1, 1985, due date for fiscal year 1986 plan certifications and fiscal year 1985 accomplishment reports. We reviewed TVA's DVAAP plans for fiscal years 1983 through 1986, the accomplishment reports for fiscal years 1983 through 1985, and related documents; we correlated fiscal years 1984 and 1985 plans with accomplishment reports to determine TVA's progress in implementing its plans. We also reviewed TVA's accomplishments for fiscal year 1986 through July 1986.

To determine the percentage of disabled veterans affected by personnel transactions, we analyzed TVA's work force statistics (including hirings, promotions, and terminations) for fiscal years 1981-85. TVA's Division of Personnel and the Equal Opportunity Staff provided the statistics from a data base maintained by Personnel. According to the chief of TVA's, Information Management Systems Branch, Division of Personnel, TVA does not maintain individual personnel file folders for its employees; each employee's personnel transactions are microfilmed and maintained

on microfiche in, what TVA refers to as, "a personal history record." This is the same system TVA uses to prepare reports required by OPM. After interviewing the manager of the system about pertinent internal controls and reviewing a few personal history records on microfiche, we accepted the data provided.

In reviewing TVA's DVAAP and employment trends, we did not conduct a survey of the labor market to determine the following: if additional disabled veterans could have been hired; if they were available and qualified to be hired; and, if so, where such disabled veterans might be located. Although the Department of Labor and the Veterans Administration had some general nationwide data on disabled veterans, neither agency had data, by geographic location, concerning the availability or skills of disabled veterans.

We visited OPM's headquarters and interviewed officials from the Office of Affirmative Employment Programs. We reviewed OPM's records on its monitoring of TVA's DVAAP, but did not evaluate OPM's role or activities. We also visited the Veterans of Foreign Wars (VFW) national office in Washington, D.C., and discussed DVAAP issues with a VFW official. The VFW had received complaints from disabled veterans at TVA. In May 1986, after we discussed TVA's activities with the Subcommittee office, the Chairman of the House Committee on Veterans' Affairs requested a review of (1) OPM's role in carrying out DVAAP and (2) several other agencies' DVAAP activities. (This review is ongoing.)

As agreed with the Chairman's office, we did not obtain formal comments from TVA and OPM. However, we discussed the contents of this report with officials of both agencies and incorporated their comments where appropriate.

Except for not obtaining formal TVA and OPM comments, our review was done in accordance with generally accepted government auditing standards.

# Program Essentially Complied With Regulatory Requirements

In fiscal years 1985 and 1986, TVA complied with all regulatory requirements concerning DVAAP plans and accomplishment reports, except for submitting its annual plan certifications or accomplishment reports to OPM by the December 1 due date. OPM had previously commented that TVA's fiscal year 1983 DVAAP plan was generally unsatisfactory. In comparing TVA's timeliness with 99 other federal agencies in meeting the December 1, 1985, due date, we found that 74 of them were late.

Some disabled veteran employees at TVA asserted that the Veterans' Preference Act accorded them a preference for promotions, just as it does for hiring and retention. However, we agree with TVA and OPM's position that disabled veterans are not legally entitled to any specific preference in selection for promotions.

## TVA's DVAAP Plans and Accomplishment Reports Have Improved

TVA submitted its first DVAAP plan to OPM on May 13, 1983. OPM commented on the plan on September 15, 1983; as mentioned above, OPM noted that, although the plan had some good points, it was generally unsatisfactory because it made no use of the statistical data and formats that TVA and OPM had developed in 1982. According to the program manager of Handicap Services, TVA provided the data in formats different from those requested by OPM. He told us that there was a misunderstanding between his office and OPM concerning the formats to be included in the plan. OPM also commented that TVA had "room for improvement" in the percentage of disabled veterans promoted and that TVA should place more emphasis on hiring disabled veterans.

On December 28, 1983, TVA submitted its fiscal year 1984 DVAAP plan and fiscal year 1983 accomplishment report for OPM's review. In March 1984, OPM conducted an on-site review of TVA's DVAAP at TVA headquarters. OPM did this because of TVA's relatively large size (37,000 employees at that time), its importance as a major federal employer in the Southeast, and the number of inquiries and complaints about its employment policies for disabled veterans. An OPM representative interviewed TVA officials and 23 TVA employees who were disabled veterans. Each of these employees, after receiving notice of the on-site visit, had requested an interview with the OPM representative.

In its October 10, 1984, report, OPM cited weaknesses in TVA's recruiting, hiring, and promoting of disabled veterans. OPM recommended that TVA (1) address recruitment activities in the fiscal year 1984 plan, (2) consider adding resources (ideally a well-qualified disabled veteran) to successfully implement DVAAP, (3) revise the plan's section on advancement

within TVA, and (4) train and sensitize managers and supervisors to DVAAP policies and procedures. OPM's general finding was that ". . . as a class, disabled veterans have been neglected at TVA."

According to OPM's report, the 23 veterans interviewed expressed concerns over such issues as the lack of (1) management knowledge of DVAAP, (2) training and promotion, and (3) input from disabled veterans on programs for them.

On February 11, 1985, TVA responded to OPM's report. TVA proposed to

- increase recruiting efforts and expand contacts with agencies providing services to disabled veterans;
- revise its policy statement on equal opportunity and affirmative action responsibilities of TVA employees to specifically include disabled veterans;
- provide awareness training to managers and supervisors to sensitize them to the DVAAP;
- establish an advisory committee for handicapped employees, including disabled veterans; and
- investigate the situations described by the 23 disabled veterans interviewed.

In May 1985, TVA submitted its fiscal year 1985 DVAAP plan and fiscal year 1984 accomplishment report to OPM, along with summaries of TVA's follow-up interviews with disabled veterans. OPM's report of July 8, 1985, concluded

> "TVA has submitted a DVAAP plan and accomplishment report that show many positive efforts to hire and provide job advancement opportunities for disabled veterans. TVA has progressed in its sensitivity [in this report, awareness] training for its managers and supervisors, and is holding them accountable for DVAAP in their performance appraisals. TVA should try to improve its record on recruiting disabled veterans to be . . . close[r] to the all agency average of 4.6% of the Federal work force especially in its white-collar recruitment. Career counseling and development of IDPs [individual development plans] in accordance with its DVAAP plan require immediate attention. Such actions will help alleviate the number of inquiries and complaints on DVAAP at TVA. TVA also should make every effort to coordinate its employment activities with OPM's area offices, local DOL [Department of Labor] and VA [Veterans Administration] offices, and veterans service organizations."

In July 1985, TVA officials participated in meetings in Washington, D.C., and in Knoxville, Tennessee, to discuss TVA's veterans' employment policy. Officials attending these meetings represented TVA, VFW, OPM, the Disabled American Veterans, the American Legion, the Department of

Labor, the Veterans Administration, the Tennessee Department of Labor, and the Veterans' Affairs Office of the state of Tennessee.

As a result of these meetings, TVA agreed to work with veterans' organizations, providing them with job application forms. These organizations were to get in touch with disabled veterans, help them fill out the forms, and return the forms to TVA. TVA officials told us that they provided about 200 forms, but they did not set up a system to identify these forms, and could not determine whether any had been returned to TVA. The chief of TVA's Employment Branch (part of the Division of Personnel), told us that, in the future, TVA plans to code application forms to help identify the source of applications it receives.

TVA submitted its fiscal year 1985 accomplishment report to OPM on December 5, 1985; a draft of the fiscal year 1986 DVAAP plan on December 13, 1985; and its plan certification on January 7, 1986. OPM reviewed these documents and found them to basically meet regulatory requirements, except for being late. OPM recommended that TVA establish effective internal controls to meet the December 1 due date. OPM also recommended that TVA do the following: emphasize employment of disabled veterans in its DVAAP policy statement and identify problem areas in its employment and advancement of disabled veterans. In April 1986, OPM requested that TVA submit its final fiscal year 1986 DVAAP plan for review. OPM's June 1986 report stated that the plan met applicable requirements of law and regulations. In the letter transmitting this report to TVA, OPM said: "We recognize that these are difficult times and we wish you success in the employment and advancement of disabled veterans while TVA experiences a declining work force."

We reviewed TVA's two most recent DVAAP plans and accomplishment reports and compared them with OPM's regulatory requirements. Our findings correspond with OPM's assessment: TVA currently meets regulatory requirements, except for being late in submitting the required plan certifications and accomplishment reports.

## Many Plan Certifications and Accomplishment Reports Not Timely

Each fiscal year, 1984-86, TVA did not meet the December 1 due date for certifying to OPM that it had up-to-date agency-wide DVAAP plans and for submitting its DVAAP accomplishment reports to OPM. OPM recommended to TVA that it improve internal controls to assure meeting the due date. TVA submitted its fiscal year 1985 accomplishment report on December 5, 1985 (5 days late) and fiscal year 1986 plan certification on January 7, 1986 (38 days late).

TVA is one of the executive agencies that certify to OPM that they have up-to-date DVAAP plans and submit their DVAAP accomplishment reports to OPM. According to data provided by OPM for plan certifications and accomplishment reports due on December 1, 1985, 75 of the 100 agencies reporting to OPM were late in providing the required documents and, as of March 27, 1986, 11 agencies still had not provided any documents to OPM. The 75 agencies were late an average of 38 days, as of March 27, 1986, with the range from 1 to 116 days. The 25 agencies that submitted their documents by the due date were early an average of more than 17 days, with the range from 1 to 46 days. TVA officials responsible for the DVAAP stated that they had misunderstood the requirements for plan certifications, and have instituted procedures to ensure timely certifications and timely completion of accomplishment reports.

## Disabled Veterans Not Entitled to Preference for Promotion Selection

The lack of promotion (advancement) was one of the complaints voiced by some of the 23 disabled veterans OPM interviewed at TVA in 1984; this complaint was reiterated by 5 of the 9 disabled veterans we interviewed in January 1986. Some of the disabled veterans asserted that the Veterans' Preference Act of 1944 accorded them a preference for promotion, just as it does for hiring and retention. However, our review of applicable legislation, legislative history, OPM's comments, and TVA's policy indicates that disabled veterans are not entitled to a preference in selection for promotion.

In OPM's October 1984 report on TVA's DVAAP, OPM found that "TVA is complying with the applicable provisions of the VPA (Veterans' Preference Act)." The first paragraph of TVA's policy on veterans' preference states:

> "TVA gives preference to veterans in selection for appointment and for retention in reduction in force. Its procedures for doing this are in accord with the Veterans' Preference Act, as amended, and Office of Personnel Management (OPM) regulations issued pursuant to that act. The Act does not provide for preference to veterans in selection for promotion, transfer, or reassignment. OPM regulations are also followed in determining whether or not an applicant or employee who has served in the uniformed services is entitled to veterans' preference." (Underscoring added.)

We agree with OPM's and TVA's assessments. Our review disclosed that nothing in the Veterans' Preference Act of 1944, as amended, or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, requires that veterans be given preference for promotion. These statutes do not require that advancement opportunities be reserved for disabled veterans or that extra points be given to those competing for promotion.

# Mixed Results in Implementing Program

TVA's plans for implementing its DVAAP contained broad objectives and detailed "action steps" (e.g., conducting workshops or developing an automated information system) for achieving them. As of July 1986, TVA has had mixed results in implementing action steps related to objectives contained in its fiscal years 1985 and 1986 DVAAP plans. In general, TVA has implemented objectives designed to (1) provide training to managers and supervisors, sensitizing them to DVAAP policies and the needs of disabled veterans; (2) initiate an advisory committee of handicapped persons, including disabled veterans; (3) accommodate jobs to recognize the abilities and limitations of disabled veterans; and (4) ensure barrier-free design in TVA facilities.

TVA has not been successful in implementing objectives designed to (1) increase the number of disabled veterans on its employment registers; (2) increase internal advancement opportunities; and (3) provide job opportunities, both within and outside TVA, for disabled veterans scheduled for reductions-in-force. We recognize that such factors as employment trends and the availability of qualified disabled veterans may affect TVA's ability to hire and promote them. Between September 1980 and September 1985, TVA's employment decreased from about 52,100 to about 32,400 employees; the number of disabled veterans employed by TVA decreased from 1,002 to 824 disabled veterans. From fiscal year 1981 to fiscal year 1985, the percentage of disabled veterans employed by TVA increased from 1.9 to 2.5 percent. The following sections discuss TVA's activities in implementing its fiscal years 1985 and 1986 DVAAP plans.

## TVA Has Implemented Several Plan Objectives

TVA has implemented the following four DVAAP plan objectives for fiscal years 1985 and 1986. TVA has (1) made TVA managers and supervisors aware of DVAAP; (2) established an advisory committee for the handicapped that included disabled veterans; (3) emphasized the job accommodation concept; and (4) developed a plan to make TVA facilities barrier free.

### Awareness Training for TVA Managers and Supervisors

In its October 1984 report, OPM recommended that supervisors and managers be trained in, and made aware of, the policies and procedures of the DVAAP. In the DVAAP plans for fiscal years 1985 and 1986, TVA included the objective of providing such awareness training through action steps involving seminars, workshops, and publications.

In March 1985, TVA provided awareness training to about 65 people involved in administering affirmative action programs throughout TVA. These people included personnel officers, as well as coordinators and liaisons for the disabled veteran and the handicap programs. The awareness training was not designed to instruct people about specific activities for disabled veterans; it was, rather, part of an established course concerning the handicapped in general.

In the period of March-May 1985, TVA sponsored seminars dealing with the unique needs of veterans of the Vietnam era and with the services available to these veterans through the Veterans Administration, whose staff conducted several of these seminars at a TVA nuclear plant. According to a TVA official, more than 400 veterans participated, some disabled and some managers or supervisors. In February and March 1985, at the request of a union local, TVA conducted a series of four awareness training sessions with employees who were members of the local. These sessions concerned TVA's DVAAP, Vietnam era veterans, and community resources for disabled veterans. From 14 to 19 employees attended each session.

In March 1985, TVA published a special edition of TVA's Management Newsletter on the topic, "Disabled Veterans: A Challenge." This edition focused on OPM's audit of TVA's DVAAP and provided guidelines to be used in implementing affirmative action activities intended to address specific needs of disabled veterans. This edition also highlighted those actions initiated by TVA's Equal Opportunity Staff concerning the following: (1) OPM's findings on TVA's DVAAP and (2) the role of TVA's program manager for Handicap Services as an advisor to managers on affirmative action strategies for disabled veterans. According to an official from the Equal Opportunity Staff, TVA distributed the newsletter to all employees listed on TVA's management schedule, about 4,000 people.

In fiscal year 1986, to make its employees aware of disabled veteran's concerns, TVA planned and carried out such activities as a seminar on employing the "mentally restored" and a visual presentation aimed at informing managers and supervisors about TVA's DVAAP. In June 1986, TVA pilot-tested a 4-day training course that all TVA supervisors (estimated at about 6,800 people) will be required to attend. This course, which includes information on the DVAAP, will provide supervisors with information on TVA's requirements for supervisors. According to the manager of the Office of Employee Relations, TVA plans to provide this course to all current supervisors over the next 2 years and to new supervisors within 60 days of their appointment to a supervisory position.

## Disabled Veterans Appointed to New Advisory Committee

In its October 10, 1984, report on TVA's DVAAP, OPM recommended that TVA form an advisory committee for disabled veterans. TVA included an advisory committee in its DVAAP plans for fiscal years 1985 and 1986. In 1986, TVA established an advisory committee for the handicapped that included disabled veterans as members. The committee held its first meeting in May 1986, more than 19 months after OPM's recommendation. TVA officials acknowledged that there had been an unusual delay, but pointed out that the period marked major changes in TVA's organization.

The advisory committee for the handicapped included five disabled veterans among the nine designated members. The committee also has seven alternate members, including one disabled veteran. The committee charter calls for meetings bimonthly during the first 6 months and quarterly thereafter. In addition, according to the supervisor of the Special Emphasis Programs Section, the advisory committee will be able to review and comment on the fiscal year 1987 DVAAP plan and strategies.

## Reasonable Accommodation for Disabled Veterans

TVA's fiscal years 1985 and 1986 DVAAP plans included an objective for emphasizing the reasonable accommodation concept, adapting a job to the employee's unique abilities and identified limitations. This objective was not specifically designed for disabled veterans; it applies to any handicapped employee. As of July 1986, TVA had fulfilled two of four applicable action steps for this objective and was working on the other two.

TVA's fiscal year 1985 plan included action steps to (1) issue a memorandum on legal standards for reasonable accommodation, (2) develop a worksheet and instructions to use in determining it, and (3) develop an automated information system to keep track of accommodations. TVA did not complete any of the steps in fiscal year 1985, carrying them over into fiscal year 1986. In this year, TVA added a fourth step: to develop and implement a workshop on reasonable accommodation and present it to managers and supervisors. As of July 1986, TVA had (1) issued the memorandum on legal standards, and (2) developed the worksheet and instructions on determining accommodation. In addition, TVA has conducted a pilot test of the workshop on reasonable accommodation. According to the program manager for Handicap Services, TVA plans to continue the workshops, completing them by the end of fiscal year 1987. Although information on reasonable accommodation has not been maintained systematically, TVA officials told us that TVA is working on an automated information system to track this information.

## Using Uniform Accessibility Standards for TVA Facilities

In fiscal year 1986, TVA began using the Uniform Federal Accessibility Standards to ensure that barrier-free design features and requirements were incorporated into TVA facility renovation projects. Previously, in July 1985, TVA held a seminar in Knoxville to discuss these standards.

TVA's fiscal year 1985 DVAAP plan included as an objective adoption of Uniform Federal Accessibility Standards. The program manager of Handicap Services told us that this objective was not designed just for disabled veterans, but would benefit anyone working at, or visiting, TVA facilities. As of July 1986, TVA had planned 30 facilities' renovation projects during fiscal years 1986-88, using the newly adopted accessibility standards. The costs associated with these accessibility standards had not been estimated.

## TVA Has Not Achieved Other Plan Objectives

TVA has generally not achieved objectives related to (1) increasing the number of veterans on TVA's employment registers (lists of qualified applicants), (2) increasing internal advancement opportunities, and (3) providing job placement opportunities for disabled veterans scheduled for reductions-in-force.

## Increasing Disabled Veterans on Employment Registers

TVA's fiscal years 1985 and 1986 DVAAP plans called for increasing, through recruiting and training efforts, the number of qualified disabled veterans on TVA's employment registers. As of July 1986, TVA has had little success in fulfilling this objective through recruiting. The training programs have served only 3 disabled veterans, of some 340 total participants, in fiscal years 1985 and 1986 (to July 1986). TVA's principal achievement during fiscal years 1984 and 1985 was hiring 33 disabled veterans as public safety officers for the Division of Public Safety Service, Office of Corporate Services.

### Recruiting Activities

In its October 1984 report, OPM recommended that TVA consider adding resources to implement its DVAAP. For fiscal year 1985, TVA planned to increase its recruiting efforts by adding another person to its recruiting staff. However, budget cuts in the Division of Personnel prevented this from occurring, according to a TVA Employment Branch (Division of Personnel) official.

TVA's on-campus recruiting efforts were all but eliminated in fiscal years 1984 and 1985. TVA officials told us that TVA had nine recruiters in 1980, but only two as of July 1986. In a February 1986 memorandum to TVA's

General Manager, the manager of TVA's Office of Employee Relations stated that, except for isolated situations, TVA has not actively recruited on-campus since the spring of 1984. According to the chief of the Employment Branch, in fiscal years 1985 and 1986, TVA did not hire any disabled veterans through college recruitment efforts.

Other recruiting strategies discussed in the fiscal year 1985 DVAAP plan included advertising in a magazine for the disabled, working with local and state rehabilitation agencies, and working with the local veterans' center. TVA did not get any response from the magazine advertising; in addition, TVA officials told us they did not know whether the other strategies resulted in increasing the number of disabled veterans at TVA because TVA did not keep track of the source of job applications received.

In its fiscal year 1985 accomplishment report, TVA stated that the principal agency action initiated in fiscal year 1985, to provide job opportunities for disabled veterans, was the commitment made by TVA's Division of Public Safety Service to hire disabled veteran applicants as public safety officers. A total of 33 disabled veterans were employed by the division within an 18-month period. This employment activity was made possible through the efforts of the Employment Branch working together with the Division of Public Safety Service.

## Training Programs

TVA's DVAAP plans for fiscal years 1985 and 1986 stated that TVA planned to develop and implement training programs to provide skills or work experience for college students or unemployed or disabled people. These programs were the (1) Student Training and Employment Project, (2) Cooperative Education Program, and (3) Training and Orientation Project. Only one disabled veteran was included in these programs in fiscal year 1985 and only two in fiscal year 1986 (see table 3.1).

**Table 3.1: Disabled Veterans Taking TVA Training Programs** (Fiscal Years 1985 and 1986)

| | Fiscal year 1985 | | Fiscal year 1986[a] | |
|---|---|---|---|---|
| Training program | Disabled veterans | Other | Disabled veterans | Other |
| Student Training | 0 | 55 | 0 | 39 |
| Cooperative Education | 1 | 289 | 0 | 280 |
| Training and Orientation | 0 | 3 | 2 | 7 |

[a]As of July 1986.

According to the supervisor of the College and Professional Relations Staff (Employment Branch), the Student Training and the Cooperative

Education programs are designed to give college students paid work experience and to provide TVA with a possible source of new employees. Both of these programs are open to disabled veterans who are students, but neither was designed specifically for either disabled veterans or the handicapped. OPM's acting assistant director for Affirmative Employment Programs told us that fewer veterans are currently enrolled in college, so fewer disabled veterans are available to participate in these kinds of programs.

The Training and Orientation Project, according to the manager of TVA's Handicap Services, was designed to serve the handicapped and disabled veterans, providing participants on-the-job work experience for up to 1 year. The program is administered by TVA's Equal Opportunity Staff through cooperative agreements and contracts with the Tennessee State Vocational Rehabilitation Agency and the Veterans Administration. TVA does not pay either the participant or the referring agency; however, the referring agency may provide some financial assistance to the participants.

## Increasing Promotion Opportunities for Disabled Veterans

For fiscal years 1985 and 1986, TVA's DVAAP plans called for increasing internal advancement opportunities for disabled veterans through career planning and an upward mobility program. Although TVA has worked on this objective, these efforts, as of July 1986, have not resulted in advancing disabled veterans. Efforts are under way to improve career planning for some disabled veterans, but no work has been done on the upward mobility program.

For fiscal year 1985, TVA's DVAAP plan included action steps to (1) consider disabled veterans for positions at selected work stations within nuclear plants (from which they were previously barred); (2) prepare individual development plans for disabled veterans (30-percent-or-more disabled) who have not progressed or have progressed slowly; and (3) review training records and data systems to determine training received by disabled veterans.

For fiscal year 1986, TVA planned to (1) design an upward mobility program, (2) follow up on individual development plans, and (3) revise the training data system to determine what training veterans have had. The 1986 plan did not carry forward the action step for advancing disabled veterans at nuclear plant sites.

In its DVAAP accomplishment report for fiscal year 1985, TVA stated that its Office of Power and Engineering (Nuclear) had authorized disabled veterans to be considered as candidates for jobs in general use areas at nuclear plant sites. These general use areas are predominantly those parts of the plant where office-type positions are located. As of July 31, 1986, TVA had not determined how many positions would be made available, and no disabled veterans had advanced under this action step. According to TVA's manager for Handicap Services, the major reasons this action step was not implemented were (1) a change in responsible personnel and (2) the reorganization in TVA's Office of Power and Engineering.

TVA's Equal Opportunity Staff generated computer listings of all personnel actions for 244 disabled veterans (30-percent-or-more disabled) and, in February 1986, sent the listings to 22 personnel offices throughout TVA. Each office was supposed to review the disabled veterans' personnel records to determine whether career planning is needed for those veterans who (1) may be lacking the necessary skills for advancement or (2) may have remained at entry-level positions or progressed slowly into higher level positions.

As of July 1986, according to TVA's supervisor of the Special Emphasis Programs Section, 13 of 22 offices had responded, recommending that individual development plans be prepared for 24 disabled veterans; other offices had not completed their reviews. Individual development plans had not been prepared for these 24 veterans, according to TVA's manager of Handicap Services; however, this effort is still in process and TVA has not set a time for completion of all development plans.

As another action step aimed at increasing TVA's promotion opportunities, TVA planned to review disabled veterans' training records and to revise its automated system, which provides data to monitor training received by employees. TVA's Equal Opportunity Staff is revising the system to identify disabled veterans. The director of the Equal Opportunity Staff told us that the training data would permit TVA to identify the kind and amount of training received by disabled veterans, as well as others, throughout the organization. These data would allow TVA officials to decide how to improve training and the funding for it. This effort is still in process.

Although the DVAAP plans included an upward mobility program, as of July 1986, TVA has made no progress in developing such a program. The supervisor, Special Emphasis Programs Section, told us that resources

were not available to design the upward mobility program this year, and she was not sure whether it will be carried over into the plan for fiscal year 1987.

## Placement Opportunities for Disabled Veterans

For fiscal years 1985 and 1986, TVA DVAAP plans called for the development of placement opportunities, both within and outside TVA, for disabled veterans scheduled for reductions-in-force. Specific procedures for placing these veterans within TVA were not developed. While TVA provided opportunities to place such employees outside TVA, these opportunities were made available to all affected employees and were not specifically targeted to disabled veterans. TVA's records did not contain information on the extent to which disabled veterans received services for placement within or outside TVA. However, TVA officials told us that TVA plans to report this information in its fiscal year 1986 accomplishment report. TVA planned a demonstration project for placing employees outside of TVA, but the project was canceled because it duplicated an existing one.

To provide placement opportunities in fiscal year 1985, TVA specified steps to (1) initiate procedures for internal placement of disabled veterans scheduled for reductions-in-force by referring their names to TVA's Employment Branch, (2) continue using an outside placement program, and (3) implement a demonstration placement project. For fiscal year 1986, the plan contained essentially the same action steps, as well as a step to review the outside placement program and determine how many veterans were served.

The chief of TVA's Employment Branch told us that TVA did not initiate any specific help for placing (within TVA) disabled veterans terminated through reductions-in-force. He said that the normal guidelines concerning reductions-in-force, as stated in TVA's negotiated union agreements, were followed. Generally, these agreements provide that, during a reduction-in-force, certain employees selected for termination have reassignment rights; these employees may displace other employees at a different competitive level. In addition, the names of some separated employees may be carried for up to 2 years on reemployment lists. The chief also told us that no reports were prepared for the fiscal year 1985 accomplishment report; therefore, there was no record of how many disabled veterans went through reductions-in-force and how many had their names placed on reemployment lists. He said that data are available for the fiscal year 1986 accomplishment report. According to TVA's statistics for fiscal year 1985, 69 disabled veterans (14 in salary-policy

and 55 in trades and labor classifications) were terminated through reductions-in-force.

In fiscal year 1985, TVA contracted with a firm that specializes in placement services to provide a formal placement program (for jobs outside of TVA) for employees who were terminated at the Bellefonte power plant. According to the affirmative action officer in the Office of Construction (Office of Power and Engineering), the program was designed for the employees in the salary-policy classifications, but not for employees in the trades and labor classifications. He told us that the employees in trades and labor turned to their unions for assistance.

According to the affirmative action officer, the program was voluntary, and no data or statistics were kept concerning disabled veterans. In June 1986, in response to our questions, TVA identified three disabled veterans who participated in the outside placement project for terminated employees, two in fiscal year 1985 and one in fiscal year 1986. According to the chief of the Employment Branch, TVA has determined that records are sufficient to permit identification of disabled veterans who benefited from this program; these data will be included in the fiscal year 1986 accomplishment report.

For fiscal years 1985 and 1986, TVA planned to implement an outside demonstration project to help relocate disabled veterans (and other handicapped persons) with local enterprises. The project was to be implemented by the Division of Medical Services (Office of Corporate Services) and the Special Emphasis Programs Section. In July 1986, the program manager for Handicap Services informed us that the project was canceled. An official of the Division of Medical Services told us that the project duplicated its ongoing activities for assisting TVA's injured workers with placement in the private sector.

## TVA Actions

In a May 29, 1986, letter, TVA's General Manager told us that TVA has recognized that it needs to do more to enhance the interests of veterans. He said that TVA is planning to concentrate all veterans' activities in a new Veterans' Affairs Unit within the Division of Personnel. A senior manager will supervise this unit, and have considerable authority to implement programs and policies designed to ensure all veterans fair treatment at TVA. The unit supervisor will be the liaison with veterans' groups, the Department of Labor, and the Veterans Administration. The unit supervisor will be responsible for ensuring that plans and procedures are in place and being implemented to

- improve recruitment of disabled veterans, with the goal of disabled veterans' composing 4.6 percent of the work force;
- promote career counseling and ensure individual development plans are in place for veterans with a 30-percent-or-more disability; and
- coordinate employment and recruitment activities with the Department of Labor, Veterans Administration, and veterans' service organizations.

In mid-October 1986, TVA hired a disabled veteran to be in charge of the new Veterans' Affairs Unit. This unit will have certain recruiting responsibilities, coordinate all veterans' programs at TVA, and participate in developing TVA's DVAAP plans and accomplishment reports. According to the manager of the Office of Employee Relations, the Special Emphasis Programs Section will continue to be responsible for preparing the plans and reports. The manager told us that the Veterans' Affairs Unit will play a key role in developing the plans, and will be primarily responsible for seeing that the plans are implemented. Based on TVA's experience with the new unit, TVA will make adjustments, as necessary, to ensure fair treatment for all veterans at TVA.

## Conclusions

TVA has had mixed results in achieving its DVAAP plan objectives. TVA had achieved objectives related to (1) providing awareness training to supervisors and managers, (2) establishing an advisory committee for the handicapped that included disabled veterans, (3) providing guidance on the reasonable accommodation concept, and (4) implementing a barrier-free design policy.

TVA has not achieved objectives related to (1) increasing the number of disabled veterans on its employment registers, (2) increasing advancement opportunities within TVA for disabled veterans, and (3) providing placement opportunities, both within and outside TVA, to disabled veterans scheduled for reductions-in-force. We recognize that such factors as recent TVA employment reductions and the age and availability of qualified disabled veterans might affect TVA's ability to employ or promote disabled veterans.

We believe that TVA's plan to establish a Veterans' Affairs Unit to coordinate all veterans' programs, including those for disabled veterans, can improve TVA's ability to serve disabled veterans and could result in a more viable DVAAP.

# TVA Employment Data on Hirings, Promotions, and Terminations (Fiscal Years 1981-85)

The number of TVA's disabled veterans affected by such personnel actions as hirings, promotions, and terminations are shown in tables I.1 through I.3. According to TVA officials in the Division of Personnel and on the Equal Opportunity Staff, there are two distinct groups of employees at TVA, salary-policy and trades and labor. The salary-policy group includes permanent employees in management, scientific, and administrative positions. The trades and labor group includes employees who construct, operate, and maintain TVA's facilities; they may be employed for specific segments of work at set wages. When job segments are completed, these employees are terminated, and they turn to their unions for other jobs.

TVA officials told us that because of differences between the two groups, salary-policy employees are more likely to be promoted, and trades and labor employees are more likely to be involved in hirings and terminations.

**Table I.1: Disabled Veterans Terminated at TVA** (Fiscal Years 1981-85)

| Fiscal year | Total number of employees terminated | Disabled veterans terminated | | |
|---|---|---|---|---|
| | | Salary-policy | Trades and labor | Total |
| 1981 | 23,078 | 23 | 143 | **166** |
| 1982 | 25,035 | 92 | 245 | **337** |
| 1983 | 14,934 | 46 | 142 | **188** |
| 1984 | 15,404 | 56 | 138 | **194** |
| 1985 | 13,030 | 44 | 296 | **340** |

In each of these years, 85 percent of TVA's terminations were among trades and labor employees. As shown in figure 1.1 on page 10, the percentage of trades and labor employees at TVA has declined since fiscal year 1981.

**Table I.2: Hiring of Disabled Veterans at TVA** (Fiscal Years 1981-85)

| Fiscal year | Total number of hires | Hiring of disabled veterans | | |
|---|---|---|---|---|
| | | Salary-policy | Trades and labor | Total |
| 1981 | 19,755 | 20 | 162 | **182** |
| 1982 | 14,643 | 14 | 170 | **184** |
| 1983 | 11,947 | 14 | 143 | **157** |
| 1984 | 11,716 | 18 | 125 | **143** |
| 1985 | 11,251 | 60 | 237 | **297** |

Between fiscal years 1981-85, more than 88 percent of TVA's total hires were among trades and labor employees. Information on 1985 TVA hires showed that more than 80 percent of the employees had previously worked for TVA, but had been terminated for some reason. According to a TVA official, most of the rehired employees were among trades and labor employees; these rehired employees had returned to work on another project from the one they were working on when they were terminated.

Disabled veterans promoted at TVA, during fiscal years 1981-85, are shown in table I.3.

**Table I.3: Disabled Veterans Promoted at TVA** (Fiscal Years 1981-85)

| Fiscal year | Total number of employees promoted | Disabled veterans promoted | | |
|---|---|---|---|---|
| | | Salary-policy | Trades and labor | Total |
| 1981 | 8,490 | 64 | 71 | **135** |
| 1982 | 5,935 | 33 | 34 | **67** |
| 1983 | 11,604[a] | 188 | 25 | **213** |
| 1984 | 3,637 | 49 | 20 | **69** |
| 1985 | 5,388 | 78 | 24 | **102** |

[a]TVA officials attributed the fiscal year 1983 increase to classification changes in the scientific and engineering categories.

# Requirements for DVAAP Plans and Accomplishment Reports

OPM's Federal Personnel Manual (ch. 720, sub. 3), dated February 14, 1983, contains instructions implementing the DVAAP. These instructions implement the regulations in 5 C.F.R. 720, which were issued according to OPM's authority under section 403 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 2014).

OPM requires each executive agency, including TVA, to develop a plan promoting government employment and job advancement opportunities for qualified disabled veterans. According to OPM instructions, plans, submitted to OPM on request, must contain the following:

- A statement of the agency's policy with regard to the employment and advancement of disabled veterans, especially those who are 30-percent-or-more disabled.
- The name and title of the official assigned overall program leadership for the plan.
- An assessment of the current status of disabled veteran employment, with emphasis on those veterans who are 30-percent-or-more disabled.
- A description of recruiting methods that will be used to seek out disabled veteran applicants, including measures to be taken to recruit veterans who are 30-percent-or-more disabled.
- A description of how the agency will provide or improve internal advancement opportunities for disabled veterans.
- A description of how the agency will inform its components, including field installations, on a regular basis, of their responsibilities for employing and advancing disabled veterans.
- A description of how the agency will monitor, review, and evaluate its plan efforts, including implementation at components (including field installation) during the period covered by the plan.

Each agency is also required to submit to OPM, by December 1 of each year, an accomplishment report on the plan for the previous fiscal year. According to OPM instructions, these reports must contain the following:

- Methods used to recruit and employ disabled veterans, especially those who are 30-percent-or-more disabled.
- Methods used to provide or improve advancement opportunities within an agency for disabled veterans.
- A description of how the activities of major components, including field installations, were monitored, reviewed, and evaluated.
- An explanation of the agency's progress in implementing its DVAAP plan during the fiscal year.

In addition, OPM instructions specify that each agency must certify to OPM, by December 1 of each year, that it has an up-to-date plan. This certification may be submitted as part of the agency's annual accomplishment report.

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